

**Exhibit E**  
to  
**Webb Declaration**

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12 CHUNGHWA PICTURE TUBES, LTD.

13  
14 UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION,

18 This Document Relates To:

19 DIRECT PURCHASER ACTIONS and  
20 INDIRECT PURCHASER ACTIONS

21 CASE NO. 3:07-CV-5944 SC

22 DEFENDANT CHUNGHWA PICTURE  
23 TUBES, LTD.'S RESPONSES AND  
24 OBJECTIONS TO DEFENDANT LG  
25 ELECTRONICS USA, INC.'S FIRST SET  
26 OF REQUESTS FOR ADMISSION

27 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Chunghwa  
28 Picture Tubes, Ltd. ("Chunghwa") objects and responds to Defendant LG Electronics USA, Inc.'s  
First Set of Requests for Admission ("Requests"). Chunghwa reserves the right to supplement the  
responses set forth below.

29 **GENERAL OBJECTIONS**

30 Chunghwa incorporates the following General Objections into the specific Responses set forth  
31 below. Chunghwa does not waive any of these General Objections in its Responses to the specific  
32 Requests propounded. Any specific objection made by Chunghwa in no respect limits or modifies  
33 these General Objections.

1       1. Chunghwa objects generally to the Requests to the extent they exceed the scope of  
 2 discovery permitted under the Federal Rules of Civil Procedure and the Local Rules.

3       2. Chunghwa objects generally to the Requests to the extent that they seek disclosure of  
 4 information subject to the attorney-client privilege, attorney work product doctrine, joint defense  
 5 privilege, or any other applicable privilege or protection available under any and all applicable laws.  
 6 Any inadvertent disclosure of privileged information shall not constitute a waiver of any otherwise  
 7 valid claim of privilege, and any failure to assert a privilege as to one document or communication  
 8 shall not be deemed to constitute a waiver of the privilege as to any other document or  
 9 communication so protected.

10     3. Chunghwa objects generally to the Requests to the extent that they seek information  
 11 containing or relating to trade secrets, proprietary, or confidential information protected by  
 12 constitutional, statutory or common law rights of privacy. *See, e.g.,* Cal. Const. art. I, § 1.

13     4. Chunghwa objects generally to the Requests to the extent that they seek information  
 14 that is not relevant to the claims or defenses of any party in these actions.

15     5. Chunghwa's responses are based on information known to Chunghwa at this time.  
 16 Chunghwa objects generally to the Requests as overbroad and impermissible to the extent that they  
 17 request admission of matters beyond the knowledge of Chunghwa. Chunghwa reserves the right to  
 18 supplement or amend its responses based on subsequently learned information.

19     6. Without limiting the generality of the foregoing objections, Chunghwa objects to the  
 20 definitions to the extent they purport to impose on Chunghwa obligations different from or beyond  
 21 those imposed by the Federal Rules of Civil Procedure and the rules and orders of the Court.

22     7. Chunghwa reserves all other objections, including but not limited to objections to the  
 23 relevance, admissibility, or authenticity of all information provided.

24     8. To the extent Chunghwa admits any request, the response should not be interpreted as  
 25 admitting anything other than the matter specifically stated in the request.

1                   **RESPONSES TO REQUESTS FOR ADMISSION**

2                   **REQUEST FOR ADMISSION NO. 1:**

3                   Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT  
4                   Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished  
5                   Products, concerning the prices at which any such Manufacturers or Sellers sell those Finished  
6                   Products.

7                   **RESPONSE TO REQUEST FOR ADMISSION NO. 1**

8                   Chunghwa incorporates by reference its General Objections set forth above as though fully set  
9                   forth herein.

10                  Subject to and without waiver or limitation of any of its objections, Chunghwa responds as  
11                  follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT  
12                  Finished Products.

13                  **REQUEST FOR ADMISSION NO. 2:**

14                  Admit that Chunghwa is not aware of any conspiracy among Manufacturers or Sellers of CRT  
15                  Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished  
16                  Products, to fix or set the prices at which any such Manufacturers or Sellers sell those Finished  
17                  Products.

18                  **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

19                  Chunghwa incorporates by reference its General Objections set forth above as though fully set  
20                  forth herein.

21                  Subject to and without waiver or limitation of any of its objections, Chunghwa responds as  
22                  follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT  
23                  Finished Products.

24                  **REQUEST FOR ADMISSION NO. 3:**

25                  Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT  
26                  Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished  
27                  Products, to reduce or limit the supply of those Finished Products.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

Chunghwa incorporates by reference its General Objections set forth above as though fully set forth herein.

Subject to and without waiver or limitation of any of its objections, Chunghwa responds as follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT Finished Products.

**REQUEST FOR ADMISSION NO. 4:**

Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished Products, to allocate customers, territories or markets for those Finished Products.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

Chunghwa incorporates by reference its General Objections set forth above as though fully set forth herein.

Subject to and without waiver or limitation of any of its objections, Chunghwa responds as follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT Finished Products.

DATED: May 10, 2010

GIBSON, DUNN & CRUTCHER LLP  
JOEL S. SANDERS  
JOSHUA D. HESS

By: Joel S. Sanders  
Joel S. Sanders

Attorneys for  
CHUNGHWA PICTURE TUBES, LTD.

## **VERIFICATION**

I, S.J. Yang, am Vice President of Chunghwa Picture Tubes, Ltd. and am authorized to make this verification on behalf of Chunghwa Picture Tubes, Ltd., Inc. I have read the attached Defendant Chunghwa Picture Tubes, Ltd.'s Responses and Objections to Defendant LG Electronics USA, Inc.'s First Set of Requests for Admission and know its contents. I am informed and believe that the matters and things stated therein are true.

I verify under penalty of perjury that the foregoing is true and correct.

Executed this 6 day of May, 2010, at Chunghwa Fuzhou.

S. J. Yang

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## **CERTIFICATE OF SERVICE**

I, Diana Reger, declare as follows:

I am employed in the office of a member of the bar of this Court, at whose direction this service is made; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission St., Ste. 3000, San Francisco, California 94105, in said County and State. On May 10, 2010, I served the within:

**DEFENDANT CHUNGHWA PICTURE TUBES, LTD.'S  
RESPONSES AND OBJECTIONS TO DEFENDANT LG ELECTRONICS USA, INC.'S  
FIRST SET OF REQUESTS FOR ADMISSION**

as indicated below:

SEE ATTACHED LIST

**BY MAIL:** I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE:** I placed a true copy in a sealed envelope addressed to each person[s] named at the address[es] shown and giving same to a messenger for personal delivery before 5:00 p.m. on the above-mentioned date.

**BY FACSIMILE:** From facsimile machine telephone number (415) 393-8304, on the above-mentioned date, I caused to be served a full and complete copy of the above-referenced document[s] by facsimile transmission to the person[s] at the number[s] indicated.

**BY OVERNIGHT SERVICE:** I placed a true copy in a sealed envelope addressed as indicated above, on the above-mentioned date. I am familiar with the firm's practice of collection and processing correspondence for delivery by overnight service. Pursuant to that practice, envelopes placed for collection at designated locations during designated hours are delivered to an overnight service carrier with a fully completed airbill, under which all delivery charges are paid by Gibson, Dunn & Crutcher, that same day in the ordinary course of business.

**BY ELECTRONIC MAIL:** On the above-mentioned date, I served a full and complete copy of the above-referenced documents by electronic mail to the persons at the addresses indicated

## **Attorneys for Defendants**

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**LG Electronics, Inc.; LG Electronics USA, Inc.**

**LG Electronics Taiwan Taipei Co. Ltd.**

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I certify under penalty of perjury that the foregoing is true and correct, and that this Certificate of Service was executed by me on May 10, 2010, at San Francisco, California.

Diana Roger

Diana Reger

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